# EXHIBIT 2

1	GREGORY J. BÁBCOCK, SBN 260437 645 First St. West, Suite D Sonoma, California 95476		
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5	Attorneys for Plaintiff,		
6	Janina M. Hoskins, Trustee in Bankruptcy		
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8	UNITED STATES BANKRUPTCY COURT		
9	NORTHER DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11	In re ) Case No.: 12-30143 DM ) (Chapter 7)		
12	CARL ALEXANDER WESCOTT and ) MONETTE ROSEMARIE STEPHENS, ) AP No. 12-3148		
13	)		
14	Debtors. ) INTERROGATORIES TO DEFENDANT		
15	JANINA M. HOSKINS, Trustee in ) MONETTE ROSEMARIE STEPHENS		
16 17	Bankruptcy of the Estate of Carl Alexander Wescott and Monette Rosemarie Stephens, )		
18	Plaintiff, )		
19	v.		
20	CARL ALEXANDER WESCOTT and )		
21	MONETTE ROSEMARIE STEPHENS, )  Defendants. )		
22	Defendants.		
23	PROPOUNDING PARTY: PLAINTIFF, JANINA HOSKINS, TRUSTEE IN BANKRUPTCY		
24	RESPONDING PARTY: DEFENDANT, MONETTE ROSEMARIE STEPHENS		
25	SET NUMBER: One (1)		
26	Janina M. Hoskins, the Plaintiff herein, hereby propounds the following interrogatories to		
27	Defendant Monette Rosemarie Stephens pursuant to Rule 33 of the Federal Rules of Civil		
28 Case	Procedure made applicable herein by Rule 7033 of the Federal Rules of Bankruptcy Procedure.  12-03148 Doc# 77-2 Filed: 08/16/13 Entered: 08/16/13 16:56:14 Page 2 of  8039.monette.stephens.interrogs.wpd 6		

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Case

#### DEFINITION OF TERMS

As used herein, the following terms have the meaning and significance set forth below, unless otherwise specifically indicated:

- You, Your: The terms "You" and "Your" mean the responding party, her 1. employees, agents, accountants, representatives, any corporation or partnership under her direction, or any other person or entity acting on her behalf.
- 2. Any, or, and: As used herein, "any" should be understood to include and encompass "all"; "or" should be understood to include and encompass "and"; and "and" should be understood to include and encompass "or".
- Person: As used herein, "Person" shall include a natural person, corporation, 3. partnership, unincorporated association or any kind of business or legal entity, its agents and employees
- 4. Document: As used herein, "Document" shall mean Any written or printed matter of any kind, including the originals, drafts and Any non-identical copies thereof, whether different from the original by reason of any notation made on such copies or otherwise including, but not limited to, the following: Booklets, brochures, pamphlets, circulars, notices, periodicals, papers, contracts, agreements, photographs, minutes, memoranda, messages, appraisals, analyses, reports, financial calculations and representations, invoices, accounting and diary entries, inventory sheets, diaries, appointment books or calendars, teletypes, telefaxes, thermafaxes, ledgers, trial balances, correspondence, telegrams, press releases, advertisements, notes, working papers, drawings, schedules, tabulations, projections, information or programs stored in a computer (whether or not ever printed out or displayed), and Any drafts, alterations, modifications, changes or amendments of any of the foregoing, Any graphic or manual records or representations of any kind including, but not limited to, the following: Photographs, microfiche, microfilm, videotapes, recordings and motion pictures, and Any electronic, mechanical or electrical records or representations of any kind including, but not limited to, the following: Tapes, cassettes, discs, magnetic cards and recordings. Note: This definition includes electronic mail and All other forms of electronic data.

	II .		
1	5.	Identify: As used herein, "identify" in the case of a Person means the name, last	
2	known residence address, last known business address and phone number.		
3	6.	Identify: As used herein, "identify" in the case of a Document, means to state the	
4	date the document bears, if any; the title of the Document, the author of the Document, and the		
5	present location(s) or custodian of the Document.		
6	7.	Answer: As used herein, "Answer" means Defendant's Answer to Complaint	
7	Objection to I	Discharge, on file with the United States Bankruptcy Court Northern District of	
8	California San Francisco Division in this action, In re Carl Alexander Wescott & Monette		
9	Rosemarie Stephens, Case No. 12-30143 DM and Janina M. Hoskins, Trustee In Bankruptcy of		
10	the Estate of Carl Alexander Wescott & Monette Rosemarie Stephens v. Carl Alexander Wescot		
11	& Monette Rosemarie Stephens AP No. 12-03148.		
12	<u>INTERROGATORIES</u>		
13	INTERROGATORY NO. 1:		
14	State all facts that support Your response that You did not personally borrow \$500,000 in		
15	May, 2011" as stated in ¶5 of the Answer.		
16	INTERROGATORY NO. 2:		
17	List all documents that support Your response that You did not personally borrow		
18	\$500,000 in May, 2011 as stated in ¶5 of the Answer.		
19	INTERROGATORY NO. 3:		
20	State all facts that support Your denial that the Pook Snook Dook, LP was a fraudulent		
21	asset protection entity as stated in ¶6 of the Answer.		
22	INTERROGATORY NO. 4:		
23	List al	documents that support Your denial that the Pook Snook Dook, LP was a	
24	fraudulent asset protection entity as stated in ¶6 of the Answer.		
25	INTERROGATORY NO. 5:		
26	State all facts that support Your denial that there exist any defrauded investors and bona		
27	fide creditors against You personally or otherwise, as stated in ¶8 of the Answer.		

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# INTERROGATORY NO. 6: List all documents the

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List all documents that support Your denial that there exist any defrauded investors and bona fide creditors against You personally or otherwise, as stated in ¶8 of the Answer.

## **INTERROGATORY NO. 7:**

Identify the Person who advised you to execute a document identified by you as a 'transmutation agreement' in 2010 as stated in ¶9 of the Answer.

### **INTERROGATORY NO. 8:**

Identify the Person who drafted a document identified by you as a 'transmutation agreement' in 2010" as stated in ¶9 of the Answer.

### <u>INTERROGATORY NO. 9</u>:

Identify the Person who routinely transferred monies between Your personal accounts and numerous corporations, LLCs and S.A.s, to Latin America as stated in ¶10 of the Answer.

### INTERROGATORY NO. 10:

Identify the Person who routinely wired money out of Your personal accounts and numerous corporations, LLCs and S.A.s to Latin America as stated in ¶10 of the Answer.

### <u>INTERROGATORY NO. 11</u>:

Identify the Person who withdrew \$299,949.00 on April 13 through April 22, 2011 from Ivy League Charter LLC as stated in ¶12 of the Answer.

#### INTERROGATORY NO. 12:

Identify the Person who personally caused Atlas Consulting to pay \$1,750.00 for tickets for a Broadway Show at the Curran Theater in San Francisco on May 24, 2012 as stated in ¶24 of the Answer.

#### **INTERROGATORY NO. 13:**

Identify all financial transactions You entered into to dispose of the amount of \$163,118.99 held in Your Account #241744 managed by Mission Wealth Management, 1123 Chapala Street, Suite 202, Santa Barbara, CA 93101 as of March 31, 2008.

# INTERROGATORY NO. 14:

Identify all financial transactions You entered into to pay the \$250,000 capital

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commitment made in May 2010 to the CAP VI Qualified Investors Fund, LLC, including the date of the transaction, description of collateral and description of proceeds. **INTERROGATORY NO. 15:** Identify all financial transactions You entered into to pay the \$200,000 capital commitment made in May 2010 to the CAP V Qualified Investors Fund, LLC, including the date of the transaction, description of collateral and description of proceeds. Dated: April 2, 2013 MacConaghy & Barnier, PLC Attorneys for Plaintiff Janina M. Hoskins, Trustee in Bankruptcy